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May 31, 2019

Client/Matter No. 16390-13

## **VIA E-MAIL**

Andrea Leshak, Esq.  
Office of Regional Counsel  
U.S. Environmental Protection Agency Region 2  
290 Broadway, 17<sup>th</sup> Floor  
New York, New York 10007-1866  
leshak.andrea@epa.gov

Zolymer Luna  
Caribbean Environmental Protection Division  
U.S. Environmental Protection Agency Region 2  
City View Plaza II, Suite 7000  
#48 Rd 165, km 1.2  
Guaynabo, Puerto Rico 00968-8069  
luna.zolymer@epa.gov

**RE: Response to Request for Information Pursuant to Sections 107(a) and 104(e)  
of the Comprehensive Environmental Response, Compensation and Liability  
Act for the PROTECO Site in Peñuelas, Puerto Rico**

Dear Ms. Lehsak and Ms. Luna:

On behalf of Henkel Puerto Rico, Inc. ("Henkel P.R."), we submit the following initial response to the Notice of Potential Liability and Request for Information Pursuant to Sections 107(a) and 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") for the PROTECO site in Peñuelas, Puerto Rico (the "Site") dated March 28, 2019 (the "104(e) Request"). Pursuant to correspondence with Ms. Leshak on April 5, 2019 and May 22, 2019, Henkel P.R.'s initial response is due to the United States Environmental Protection Agency ("EPA") on May 31, 2019.

As previously discussed, representatives of Henkel P.R. visited the Henkel P.R. facility in Sabana Grande, Puerto Rico and are in the process of gathering information and reviewing documents for responsiveness to the 104(e) Request. Henkel P.R. will continue to undertake a diligent inquiry into its record for responsive information and documents, and submits this initial response to demonstrate Henkel P.R.'s efforts to date in that regard. Please find Henkel P.R.'s initial response to the 104(e) Request annexed hereto as Exhibit A. Henkel P.R. will supplement this submission with additional responsive information and documents as same become available.

Do not hesitate to contact me with any questions or concerns regarding this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "M. Policastro", with a stylized flourish at the end.

MARC D. POLICASTRO

MDP/djm

Enclosures

cc: Jonathan Blaine (*via e-mail*)  
Robert McNamee (*via e-mail*)  
Melissa Jacobs (*via e-mail*)

## **EXHIBIT A**

### **GENERAL OBJECTIONS**

1. Henkel P.R. objects to the 104(e) Request and each individual request on the basis that they are overbroad and seek information beyond the scope of EPA's authority under CERCLA, 42 U.S.C. §9604(e). Specifically, Section 104(e)(1) of CERCLA, 42 U.S.C. §9604(e)(1), provides that the "authority of this subsection may be exercised only for the purposes of determining the need for response, or choosing or taking any response action under this subchapter, or otherwise enforcing the provisions of this subchapter." Henkel P.R. objects to the 104(e) Request and each individual request to the extent they seek information or documentation that is not directly related to EPA's efforts to determine the need for a response action or the specifics of any such response action with respect to the Site.
2. Henkel P.R. objects to the 104(e) Request and each individual request to the extent that they seek information that is not relevant to the purposes outlined in EPA's March 28, 2019 letter enclosing the 104(e) Request.
3. Henkel P.R. objects to the 104(e) Request and each individual request to the extent that they seek information that is privileged, including, but not limited to, information and documents protected by the attorney-client privilege and attorney work product doctrine.
4. Henkel P.R. objects to the 104(e) Request and each individual request to the extent that the terms used therein are broader or otherwise inconsistent with how those terms are defined in CERCLA, 42 U.S.C. §9601.
5. Henkel P.R. objects to the 104(e) Request and each individual request on the basis that EPA did not provide sufficient time for Henkel P.R. to review available documentation and prepare a response to each request, many of which are broad and require review of voluminous records in order to adequately respond.
6. Henkel P.R. reserves the right to supplement or amend the responses contained herein, including these objections, as additional information and documents become available.

### **RESPONSE TO REQUEST FOR INFORMATION**

1. Answer the following questions regarding the Company:
  - a. State the correct legal name and mailing address for the Company.

#### **RESPONSE:**

**Henkel Puerto Rico, Inc.  
9 V. Quilinchini Avenue  
P.O. Box 669  
Sabana Grande, Puerto Rico 00637**

- b. State the name(s) and address(es) of the President, Chief Executive Officer, and the Chairman of the Board (or other presiding officer) of the Company.

**RESPONSE:**

**Timothy Viskocil, President  
Henkel Puerto Rico, Inc.  
9 V. Quilinchini Avenue  
P.O. Box 669  
Sabana Grande, Puerto Rico 00637**

- c. Identify the state/commonwealth and date of incorporation of the Company and the name of its agents for service of process in the state/commonwealth of incorporation and in Puerto Rico, if different.

**RESPONSE:**

**State of Incorporation: Connecticut**

**Date of Incorporation: May 18, 1965**

**Agent: Corporation Service Company  
50 Weston Street  
Hartford, CT 06120-1537**

- d. Identify any successor corporations, predecessor corporations, or other entities related to the Company. If the Company is or was a subsidiary or affiliate of another corporation or other entity, identify each of those other entities' Chief Executive Officers, Presidents, and Chairpersons of the Board. Identify the state/commonwealth of incorporation and agents for service of process in the state/commonwealth of incorporation and in Puerto Rico, if different, for each entity identified in your response to this question.

**RESPONSE: Henkel P.R. objects to this request on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. §9604(e). Subject to the foregoing objections and Henkel P.R.'s General Objections, Henkel Puerto Rico, Inc. is a wholly owned subsidiary of Henkel US Operations Corporation, formerly known as Henkel Corporation.**

2. State the corporate history of the Company, including all name changes and mergers. List all names under which the Company has operated and has been incorporated. For each other name, provide the following information:

**RESPONSE: Henkel P.R. objects further on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. §9604(e). Subject to the foregoing objections and Henkel P.R.'s General Objections, Henkel Puerto Rico, Inc. has undergone the following name changes:**

- **May 18, 1965 - Contract Chemical Manufacturing Corporation incorporated**
  - **February 2, 1972 - Name Change from Contract Chemical Manufacturing Corporation to Loctite Puerto Rico, Inc.**
  - **June 27, 2002 - Name Change from Loctite Puerto Rico, Inc. to Henkel Loctite Puerto Rico, Inc.**
  - **June 1, 2005 - Name Change from Henkel Loctite Puerto Rico, Inc. to Henkel Puerto Rico, Inc.**
- a. Whether that other company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. responds that Henkel Puerto Rico, Inc. continues to exist.**

- b. Names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and

**RESPONSE: Henkel P.R. objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. Henkel P.R. objects further on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. §9604(e). Subject to the foregoing objections and Henkel P.R.'s General Objections, Henkel P.R. has identified the following management personnel:**

- **Carlos Rodríguez**  
**SHE Manager**  
**2012-Present**
- **Sigfredo Rodríguez**  
**SHE Manager**  
**1991-2012**

- **Juan Enrique Negrón Rodríguez**  
Safety, Security and Environmental Affairs Coordinator  
1988-1991

**Henkel P.R. will provide additional information responsive to this Request in a supplemental response, if such information exists and is available to Henkel P.R.**

- c. Names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of that other company.

**RESPONSE: Henkel P.R. objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. Henkel P.R. objects further on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. §9604(e). Subject to the foregoing objections and Henkel P.R.'s General Objections, Henkel P.R. will provide information responsive to this Request in a supplemental response, if such information exists and is available to Henkel P.R.**

3. Identify all changes in ownership relating to the Company from its date of incorporation to the present, including the date of any ownership change. If any owner was/is a corporation, identify if the corporation was a subsidiary or division of another corporation. In your identification of any corporation, it is requested that you provide the full corporate name, the state/commonwealth of incorporation, and all fictitious names used/held by that corporation.

**RESPONSE: Henkel P.R. objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. Henkel P.R. objects further on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. §9604(e). Subject to the foregoing objections and Henkel P.R.'s General Objections, Henkel P.R. will provide information responsive to this Request in a supplemental response, if such information exists and is available to Henkel P.R.**

4. For each owner that is a subsidiary of another corporation identified in your answer to Request #3, above, please provide a chart that details the corporate structure from that other company through all intermediary entities to the ultimate corporate parent. For purposes of this information request, the term "ultimate corporate parent" means the corporate entity that, while owning or controlling the majority of the shares of common stock in a subsidiary corporation, is not primarily owned/controlled by another corporation.

**RESPONSE: Henkel P.R. objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. Henkel P.R. objects further on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. §9604(e). Subject to the foregoing objections and Henkel P.R.'s General Objections, Henkel P.R. will provide documents**

**responsive to this request in a supplemental response.**

5. Provide copies of the Company's authority to do business in Puerto Rico. Include all authorizations, withdrawals, suspensions, and reinstatements.

**RESPONSE: Henkel P.R. objects to this Request on the basis that it seeks publically-accessible information and documentation equally available to EPA. However, subject to the foregoing objection and Henkel P.R.'s General Objections, Henkel P.R. will provide the requested documentation in a supplemental response.**

6. State the dates during which the Company owned, operated, or leased any portion of the Facility, and provide copies of all documents evidencing or relating to such ownership, operation, or lease, including but not limited to purchase and sale agreements, deeds, leases, etc.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. responds that it will provide information and/or documents responsive to this request in a supplemental response, if such information and/or documents exist and are available to Henkel P.R.**

7. Indicate whether the Company has ever operated at a location other than the Facility. If yes, provide the correct names and addresses of the Company's other facilities where the Company carried out its operations.

**RESPONSE: Henkel P.R. objects to this request to the extent it seeks information concerning entities, businesses, or operations of the Company or affiliated entities that are not relevant to the Facility or the Site. Subject to the foregoing objection and Henkel P.R.'s General Objections, Henkel P.R. responds that it will provide information responsive to this Request in a supplemental response, if such information exists and is available to Henkel P.R.**

8. Describe in detail the nature of the business and the operations conducted at the Facility and at any locations identified in response to Request #7, above, during the period that the Company operated there. Provide a brief description of the Company's operations at each facility, including the following:

- a. The date such operations commenced and concluded.
- b. The types of work performed at each facility, including but not limited to the industrial, chemical, or institutional processes and treatments undertaken at each facility.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. responds that it is still in the process of reviewing available information and documentation in order to respond to this request. Representatives of Henkel P.R. visited the Facility in May 2019 and are in the process of reviewing available information for responsiveness to the 104(e) Request. To the extent responsive information or documentation is located,**

**Henkel P.R. will provide same in a supplemental response.**

9. Describe how the Company came to possess the hazardous substances that came to be located at the Site.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the response to Request No. 8.**

10. List all hazardous substances used, generated, treated, stored, disposed of, manufactured, recycled, recovered, treated, or otherwise processed during the Company's operations at the Facility.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the response to Request No. 8. Notwithstanding the foregoing, and reserving all rights, Henkel P.R. refers EPA to the documents produced herewith.**

11. List and fully describe all waste streams generated from the Company's operations, including solid, liquid, or any other type of waste.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the response to Request No. 8. Notwithstanding the foregoing, and reserving all rights, Henkel P.R. refers EPA to the documents produced herewith.**

12. Describe in detail the handling, storage, and disposal practices employed by the Company for each waste stream resulting from the Company's operations.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the response to Request No. 8. Notwithstanding the foregoing, and reserving all rights, Henkel P.R. refers EPA to the documents produced herewith.**

13. Identify all individuals who had responsibility for the Company's environmental and waste management decisions between 1975 and 1999 (e.g., responsibility for decisions regarding the disposal, treatment, storage, recycling, or sale of the Company's hazardous substances, hazardous wastes, and industrial wastes).

- a. Provide each such individual's job title, duties, dates performing those duties, supervisors for those duties, current position, and if applicable, the date of the individual's resignation or termination.
- b. Provide the nature of the information possessed by each such individual concerning the Company's waste management.



**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the response to Request No. 8. Notwithstanding the foregoing, and reserving all rights, Henkel P.R. refers EPA to the documents produced herewith.**

14. For each type of hazardous substance, hazardous waste, and industrial waste used or generated by the Company, describe the Company's agreements or other arrangements for its disposal, treatment, storage, recycling, or sale.

- a. Provide any agreement and document, including waste logs, journals, manifests, or notes, related to any transfer of hazardous substances, hazardous wastes, and industrial wastes from the Company's Facility that came to be located at the Site.
- b. Provide all correspondence and written communications between the Company and each owner/operator of the Site regarding the Company's hazardous substances, hazardous wastes, and industrial wastes that came to be located at the Site.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the response to Request No. 8. Notwithstanding the foregoing, and reserving all rights, Henkel P.R. refers EPA to the documents produced herewith.**

15. Provide agreements and documents related to the following, including waste logs, journals, manifests, or notes, as set forth below:

- a. The locations where the Company sent each type of hazardous substance, hazardous waste, and industrial waste for disposal, treatment, or recycling.
- b. List all Waste Transporters used by the Company.
- c. For each type of hazardous substance, hazardous waste, and industrial waste, specify which Waste Transporter picked it up.
- d. For each type of hazardous substance, hazardous waste, and industrial waste, state how frequently each Waste Transporter picked up such waste.
- e. For each type of hazardous substance, hazardous waste, and industrial waste, provide the volume picked up by each Waste Transporter (per week, month, or year).
- f. For each type of hazardous substance, hazardous waste, and industrial waste, identify the dates (beginning & ending) such waste was picked up by each Waste Transporter.
- g. Indicate the ultimate location for each type of hazardous substance, hazardous waste, and industrial waste. Provide all documents indicating the ultimate disposal/recycling/treatment location for each type of hazardous substance, hazardous waste, and industrial waste.
- h. Describe how the Company managed pickups of each hazardous substance, hazardous

waste, and industrial waste including but not limited to: (i) the method for inventorying each type of hazardous substance, hazardous waste, and industrial waste; (ii) the method for requesting each type of hazardous substance, hazardous waste, and industrial waste to be picked up; (iii) the identity of the Waste Transporter employee/agent contacted for pickup of each type of hazardous substance, hazardous waste, and industrial waste; and (iv) the amount paid or the rate paid for the pickup of each type of hazardous substance, hazardous waste, and industrial waste;

- i. Identify the individual or organization that selected the location where each of the Company's wastes were taken. Describe the basis for and provide any documents supporting the answer to this Request.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the response to Request No. 8. Notwithstanding the foregoing, and reserving all rights, Henkel P.R. refers EPA to the documents produced herewith.**

16. If not already provided, specify the dates and circumstances when the Company's hazardous substances, hazardous wastes, and/or industrial wastes were sent, brought, or moved to the Site, and identify the names, addresses, and telephone numbers of the person(s) making arrangements for the containers (e.g., 55-gallon drum, dumpster, etc.) holding hazardous substances, hazardous wastes, and/or industrial wastes to be sent, brought, or transported to the Site. Please also provide all documents that support or memorialize the answer to this Request.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the response to Request No. 8. Notwithstanding the foregoing, and reserving all rights, Henkel P.R. refers EPA to the documents produced herewith.**

17. Identify, describe, and provide all documents that refer or relate to the following:
  - a. The nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all hazardous substances, hazardous wastes, and industrial wastes involved in each arrangement transferring materials from any facility owned or operated by the Company (including the Facility) to any other facility.
  - b. In general terms, the nature and quantity of the non-hazardous substances involved in each such arrangement;
  - c. The hazardous substances being mixed or combined with other hazardous substances or non-hazardous substances for each such arrangement. Indicate whether such mixing or combining is common in the industry. Indicate whether the Company was ever asked to stop mixing or combining the hazardous substances with the non-hazardous substances.

- d. Other materials other than the hazardous substances that were involved in the transaction.
- e. The condition of the transferred material containing hazardous substances when it was stored, disposed of, treated, or transported for disposal or treatment.
- f. The markings on and type, condition, and number of containers in which the hazardous materials were contained when they were stored, disposed, treated, or transported for disposal or treatment.
- g. All tests, analyses, analytical results, and manifests concerning each hazardous substance, hazardous waste, and industrial waste involved in each transaction. Include information regarding who conducted the test and how the test was conducted (batch sampling, representative sampling, splits, composite, etc.).

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the response to Request No. 8. Notwithstanding the foregoing, and reserving all rights, Henkel P.R. refers EPA to the documents produced herewith.**

18. Indicate how long the Company has had a relationship with the owner(s) and/or operator(s) of the Site.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the response to Request No. 8. Notwithstanding the foregoing, and reserving all rights, Henkel P.R. refers EPA to the documents produced herewith.**

19. Identify any individuals, including former and current employees, who may be knowledgeable of the Company's operations and practices concerning the handling, storage, and disposal of hazardous substances.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the response to Request No. 8. Notwithstanding the foregoing, and reserving all rights, Henkel P.R. refers EPA to the documents produced herewith.**

20. Please provide all documents, if not already requested above, that support your responses to Requests #1 - #19, above.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the response to Request No. 8. Notwithstanding the foregoing, and reserving all rights, Henkel P.R. refers EPA to the documents produced herewith.**

21. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:

- a. The Company's document retention policy between 1975 and 2018.

- b. A description of how the records were destroyed (burned, trashed, etc.) and the approximate date of destruction.
- c. A description of the type of information that would have been contained in the documents.
- d. The name, job title, and most current address known by you of the person(s) who would have produced these documents, the person(s) who would have been responsible for the retention of these documents, the person(s) who would have been responsible for the destruction of these documents, and the person(s) who had and/or still may have the originals or copies of these documents.
- e. The names and most current address of any person(s) who may possess documents relevant to this inquiry.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. responds that it still in the process of reviewing available information and documentation in order to respond to the 104(e) Request. Representatives of Henkel P.R. visited the Facility in May 2019 and are in the process of reviewing available information for responsiveness to this request. Should Henkel P.R. determine that documents exist (or existed) that are not available for production to EPA, Henkel P.R. will provide the information solicited in this Request.**

22. Please provide copies of the Company's financial statements, shareholder's reports, financial audits, or other financial reports showing its assets, profits, liabilities, and current financial status for the last five years.

**RESPONSE: Henkel P.R. objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. Henkel P.R. objects further on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. §9604(e). Subject to the foregoing objections and Henkel P.R.'s General Objections, Henkel P.R. will provide documents responsive to this request in a supplemental response, if such documents exist and are available to Henkel P.R.**

23. List and provide a copy of all agreements or contracts, including but not limited to insurance policies and indemnification agreements, held or entered into by the Company or its parent corporation(s), subsidiary, or subsidiaries that could indemnify it against any liability that it may have under CERCLA for releases or threatened releases of hazardous substances at and from the Facility. In response to this Request, please provide not only those insurance policies and agreements that currently are in effect, but also provide those that were in effect during the period(s) when any hazardous substances, hazardous wastes, and/or industrial wastes may have been released or threatened to be released into the environment at or from the Facility.

**RESPONSE:** Henkel P.R. objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. Henkel P.R. objects further on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. §9604(e). Subject to the foregoing objections and Henkel P.R.'s General Objections, Henkel P.R. will provide documents responsive to this request in a supplemental response, if such documents exist and are available to Henkel P.R.

24. State whether any claim or claims have been made by the Company to any insurance company for any loss or damage *related* to operation at the Site, and if so, identify each claim by stating the name of the claimant, the name and address of the insurance company, the policy number, the named insured on the policy, claim number, date of claim, amount of claim, the specific loss or damage claimed, the current status of the claim, and the amount, date, and recipient of any payment made on the claim.

**RESPONSE:** Henkel P.R. objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. Henkel P.R. objects further on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. §9604(e). Subject to the foregoing objection and Henkel P.R.'s General Objections, Henkel P.R. responds that it will provide information and/or documents responsive to this request in a supplemental response if such information and/or documents exist and are available to Henkel P.R.

25. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

**RESPONSE:** Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the response to Request No. 8.

26. State the name, title, and address of each individual who assisted or was consulted in the preparation of the response to this Request for Information. In addition, state whether this person has personal knowledge of the information in the answers provided.

**RESPONSE:** Henkel responds that the following individuals, with the assistance of counsel, assisted or were consulted in the process of preparing this response:

- Jonathan Blaine, Head – Sustainability and Environmental Affairs  
Henkel Corporation  
One Henkel Way  
Rocky Hill, CT 06067

The individuals listed above obtained the knowledge required to respond to the 104(e) Request through review of the available documents.

**CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION**

State/Commonwealth of Connecticut

County/Municipality of Hartford

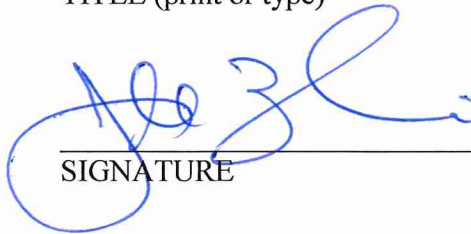
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

JONATHAN BLAINE

NAME (print or type)

Head Sustainability & Env. Affairs

TITLE (print or type)



SIGNATURE

Sworn to before me this

31<sup>st</sup> day of May, 2019



Notary Public

Tricia A. Smith  
NOTARY PUBLIC  
State of Connecticut  
My Commission Expires 1/31/2024